customer-employee descriptions of the problems would be far less technical and systematic than those that involve problems with access services today. The need to determine the appropriate human-to-system interactions across the interface in terms of trouble descriptions or appearances of troubles will be a time-consuming and necessary step in the testing of the T1M1 interfacing capabilities.

AT&T would not be able to ensure the quality of its local service offerings that are supported by an electronic, system-to-system repair and maintenance interface, That would constrain AT&T customers from getting their services back in working order in case of failure. The volume, when experienced as a result of competition in the local services market where the residential customer to line ratios are closer to 1:1, may very well outstrip the capacity of the T1M1 interface, leaving end-user customers of AT&T and other CLECs with no means to have service restored until the interface is expanded. Ameritech has stated in previous testimony and in response to data requests that capacity can be increased in ninety (90) days. The lengthy capacity adjustment interval precludes exclusive reliance on the proposed repair and maintenance interface.

Once AT&T and Ameritech begin testing the T1M1 interface, AT&T will begin to develop its understanding of the capabilities of the interface and the supporting systems in terms of manual versus electronic processing, repair transaction timing intervals, and the accuracy and accessibility of status reports from Ameritech. As no other testing has been done by any other CLECs, Ameritech currently has no factual basis for its claim that it has functioning interfaces which provide non-discriminatory repair and maintenance.

Q. PLEASE DESCRIBE THE RESULTS OF THE MICHIGAN MARKET READINESS TESTING.

A. As announced in recent news releases, AT&T has now entered the Michigan market in the Grand Rapids area, with plans to expand to other areas of the State. Given the ongoing and extensive work completed on the interfaces in Illinois, AT&T entered Michigan assuming that the parties would benefit from their Illinois experiences and see more successful test results in Michigan. Unfortunately, this assumption proved to be wrong. AT&T's Market Readiness Testing in Michigan (which began January 28, 1997) produced disturbing results.

Contrary to AT&T's expectations that the results would be better than those achieved in Illinois, the Michigan testing produced similar rates of order rejection and exception processing. As of February 14, there had been a total of 146 orders submitted. Of those orders, 94 were rejected, 40 were completed, and 12 were still pending as of February 14. Of the 40 orders completed, 19 (or 48%) fell out to manual processing. Of total orders submitted, 67 (or 46%) required manual intervention. A summary of AT&T's testing experiences in Michigan is attached as Exhibit 19 (TMC-9).[4]

This summary shows that, despite the efforts being expended by staffs from both companies, the ordering interface between Ameritech and AT&T is not yet reliable. The Michigan experience likewise raises substantial questions about the ability of the interfaces to provide AT&T with sufficient support in large-scale resale of Ameritech's local service.

[4] Although Ameritech has provided AT&T with a summary of the Michigan testing results, the summary appears to be unreliable and inaccurate. AT&T has therefore summarized the results itself. AT&T continues its analysis of the Ameritech information and I will supplement this testimony when that analysis is complete.

TESTING WITH OTHER COMPETITIVE LOCAL EXCHANGE CARRIERS

Q. WOULD YOU COMMENT ON THE EVIDENCE DEVELOPED REGARDING TESTING THAT AMERITECH HAS COMPLETED WITH CLECS OTHER THAN AT&T.

A. Yes. During the all day meeting on the subject of OSS interface testing that was held in Madison on February 27, 1997, the parties discussed the written material that AT&T provided which suggested technical, functional and measurement test criteria. For the parties at the meeting, the AT&T-supplied material served to establish a set of basic results from a reasonable testing regimen. It was my understanding, as well as that of the other AT&T staff members who attended the meeting, that Ameritech agreed to demonstrate its testing experiences with other carriers and/or its own testing processes by providing qualitative and quantitative information about that testing according to the agreed-upon list of testing criteria and dimensions. A copy of AT&T's submission to the Commission is attached as Exhibit 19 (TMC-10).

On March 3, 1997, Ameritech filed information with the Commission in an effort to demonstrate that its testing shows that its interfaces and systems work and meet the requirements of the Telecommunications Act and the FCC's Order. The testing data presented by Ameritech purports to discuss each interface, including information about the volumes of transactions and test cases applied to each OSS function.

A detailed analysis of that information, however, reveals its significant shortcomings. Ameritech fails, in all cases, to detail the expected and the actual results of test cases it ran, both internally and with other parties. This significant

omission makes it difficult, if not impossible, to determine what the testing data really shows. As discussed at the Staff's February 27, 1997 meeting, the fact that a test does not have a predicted outcome makes it difficult to measure the test on a result basis -- all that is known is that a test was performed. For instance, the results would not show that a transaction was successfully processed when it should have been rejected. Similarly, the information provided does not show time dimensions during which tests were conducted or during which transaction results were provided.

As to the testing results that Ameritech does reference, even a cursory review of the information raises serious concerns.

Q. PLEASE DISCUSS THE CONCERNS RAISED BY AMERITECH'S MARCH 3 SUBMISSION.

A. I'll turn first to the information presented on the EDI ordering interface. Ameritech attaches a letter from the President Network Recovery Services, Tim Koxlien. In that letter, Mr. Koxlien notes that NRS is relying on Ameritech's EDI ordering system only -- the system used by Ameritech to process resale orders. Mr. Koxlien notes that NRS submits electronic orders to Ameritech but does not say whether Ameritech processes those orders electronically or manually. In addition, he states that Ameritech confirms receipt of the order and "at times" gives NRS the order status, but he does not identify the "times" chosen by Ameritech to provide status information. Finally, Mr. Koxlien offers that Ameritech's order confirmation systems "is not quite solid at this time," and that NRS therefore is required to manually review order confirmation. While this approach may be acceptable to a small CLEC like NRS, it is not sufficient to support AT&T entry in the local market.

The only additional testing and usage information I have seen regarding the EDI Ordering interface is information provided by USN in Illinois. In Illinois and Ohio, Ameritech claimed that USN has tested the ordering interface, but information regarding the scope or number of the test transactions has not been produced. Moreover, USN is currently processing only approximately 20 resale orders a month. (*See* ICC Staff Data Request JEJ 3-7, attached as Exhibit 12 (TMC-1). Communications Buyer Group in Ohio has also allegedly "tested" the interface, but has yet to put the interfaces into production. Moreover, no testing documentation has been produced. Testing under order volumes that do not simulate real market conditions is necessary, but should not be considered as a proof-positive that the process can effectively support multiple providers, as Ameritech's interfaces must do.

Q. DID AMERITECH SUBMIT ANY INFORMATION ON THE TESTING AND/OR USAGE OF THE OTHER INTERFACES?

A. Yes, but much of the information submitted does not allow for a meaningful examination of other CLEC testing of Ameritech interfaces.

First, Ameritech's "OSS Validation Summary" (and supporting documentation) provides only the most cursory data regarding the testing completed to date. For each interface (except provisioning), Ameritech indicates only whether test orders have been sent across the interfaces and whether the interface has been subjected to actual usage. Ameritech does NOT indicate:

(1) whether the testing was internal or external;
(2) the number of test transactions transmitted;
(3) the type of test transactions submitted;
(4) the number of test transactions rejected or subjected to

manual processing;

(5) the volumes of transactions completed in actual usage;

(6) the number or types of transactions rejected in actual usage; or

(7) the number of transactions in actual usage subjected to manual processing.

In response to the Commission's request, Ameritech did recently produce a box of OSS-related information, including substantial testing data. Our analysis of that data is still in progress.

However, to date I have seen no data supporting testing of the provisioning interface, through which Ameritech would advise CLECs of order confirmations, order status and completion information. Notably, in Illinois, Ameritech alleged that Network Recovery System was using the provisioning interface. *See* Data Request JEJ 3-8, Exhibit 12 (TMC-1). Yet in his letter, the President of NRS suggests that NRS is relying only on the ordering interface and Ameritech provides no information about the provisioning interface in this docket.

Finally, the report prepared by Muriel McLemore and submitted by Ameritech in this docket offers little assistance. First, the report appears to have been submitted in incomplete form as AT&T received only pages 1 and 3 of the report. Nonetheless, in the pages provided, Ms. McLemore makes the following observations:

- less than 50 orders were processed during 1996;
- in Ms. McLemore's opinion, the systems were not "fully functional" during 1996, although Ameritech witnesses, in sworn testimony alleged that they were functional in 1996;

- As of February 26, 1997, 1338 orders had been "received electronically" in 1997. Of that number, 780 -- well over half -- were processed manually and 46.5% of the "automatic" orders were rejected.

Even these limited observations suggest that Ameritech's system are not in a state of readiness sufficient to support competitive entry.

Q. ARE THERE OTHER DETAILS IN THE AMERITECH TEST DOCUMENTATION THAT ARE OF CONCERN?

A. Yes. Ameritech makes the point that its filing of test data does not deal with "metropolitan" versus "ex-urban" matters as it applies to provisioning, repair and maintenance. Ameritech goes on to remark that "[t]he issue of urban/ex-urban is not a consideration when Ameritech is providing service to CLECs." This is simply not true. Installation intervals are constrained by labor resources in the specific locations where the work is to be done, and the same goes for repair and maintenance services. Testing the interfaces and systems to determine how they effectively deal with geographic and demographic diversity in terms of due dates, features available and services that can be obtained is definitely important to AT&T, and likely to be important to other CLECs. The tests of different capacities on a metropolitan versus non-metropolitan basis would assure this Commission that parts of Wisconsin that are more rural than others could expect delivery of competitive local services just as the major city environments experience competitive alternatives.

Q. WHAT IS YOUR OPINION OF THE INFORMATION PROVIDED BY AMERITECH IN RESPONSE TO MS. WIECKI'S DATA REQUEST AWW-2, PARTICULARLY NUMBERS 11 AND 12?

A. Ameritech provides some interesting perspective on CLEC requirements to be able to interact with Ameritech's OSS interfaces, and I believe it is very important to highlight some key portions of the Ameritech responses.

Ms. Wiecki asked about the availability of package solutions to the needs of CLECs to interface with Ameritech's systems and the costs to acquire technology such as these on an individual and a collective basis. Ameritech states that the expense levels shown in its response are **minimum** levels and that the integrated interface expense would be "[D]ependent on (the) sophistication of CLEC's system and degree of integration desired."

The cost amounts cited by Ameritech are extremely minimal and unless reviewed with that specific thought in mind, might cause mistaken impressions. An interfacing capability that would be acquired or built at the $12,675 price level for software alone and a $4,000 Windows-NT based PC would not go very far to serve the objective of increased competition in the local telecommunications services market. Ameritech somehow avoided informing Ms. Wiecki, at least in this data request response, that connecting to Ameritech's interfaces is necessarily complicated by the needs to make changes within a CLEC's systems environments to accommodate the Ameritech interface design.

I believe Ameritech's answer to Ms. Wiecki's reasonable inquiry as to the OSS interface system entry barrier is quite unreasonable. For example, the cost figure by Ameritech for the ASR - Beechwood Data Systems Telis - PC package ($2,500) is the price for one copy of the system for one PC user, and does not show the annual maintenance cost of $900 for each copy of the software package provided by Beechwood Data Systems. Ameritech's response regarding a software package that would deal with repair and maintenance indicates that an

Ameritech PC package would be available at no cost in February 1997. However, as Ameritech reveals in its response to Question 16 in the March 4, 1997 Staff Data Requests -- seeking information about the cost to new entrants to establish an interface with this trouble reporting interface -- the price has now jumped to "$300,000 to $600,000" for DBTA interface development.

As Ameritech's reply correctly notes, the CLEC systems efforts are indeed dependent on CLEC levels of sophistication, and they also depend on each CLEC's individual analysis of the reasonable opportunities that are available for success in competing with Ameritech and other ILECs. Ameritech's answer to Ms. Wiecki's question 11 is quite incomplete, in that it fails to provide information about all of the interfaces in question and it sidesteps her request for "estimates for a system that integrates functions so no copying of data entry is required in placing orders."

Q. HAVE YOU OBTAINED RELEVANT INFORMATION ABOUT OTHER CLEC TESTING IN CONNECTION WITH OSS PROCEEDINGS IN OTHER STATES?

A. Yes. In its responses in this docket, Ameritech identifies the other CLECs testing or using its interfaces. Included in Ameritech's list are the following:

Wisconsin Customers:

Network Recovery Services
MCI Metro
Teleport/TCG

Region-Wide Customers:

USN Communications
AT&T
Network Recovery Services
Brooks Fiber

Consolidated Communications/Midwest Fiber
ICG
MFS Intelenet
Nextlink
Teleport Communications
Time Warner
CBG
MCI
GE Rescom
Millennium Group
Sprint

The information AT&T has obtained about the testing completed by these CLECs is very limited in nature. Nonetheless, of the customers identified, the following information is notable:

Consolidated Communications: In the Illinois hearing, the Consolidated witness, Scott Jennings, testified regarding problems Consolidated was having with giving its customers information regarding the status of their order or requested repairs. As of the date of the Illinois hearing, Consolidated's concerns had not yet been addressed.

MFS Intelenet: The MFS witness testified in Illinois that, although MFS orders unbundled loops through Ameritech's ASR interface, it was unable to track the progress of those orders through Ameritech's systems. As to maintenance and repair, the MFS witness testified that trouble reports had to be made strictly on a manual basis. Attorneys for MFS Intelenet of Michigan wrote the Michigan Commission to document the "numerous operational and competitive difficulties" it experienced with Ameritech since the start of MFS local service in May 1996. As it relates to OSS problems, MFS complained of a lack of information from Ameritech regarding the provisioning of T-1 circuits and unbundled loops, often

resulting in loss of service and wasted MFS resources. *See* Robert Zener January 14, 1997 letter to Dorothy Wideman, Exhibit 20 (TMC-11).

Brooks Fiber Communications: On January 17, 1997, an attorney representing Brooks Fiber wrote the MPSC to inform it of Ameritech's "failure to provide reliable Operations Support Systems." Brooks complained that most orders could not be processed by electronic OSS, and that each order processed had to be manually confirmed by Brooks Fiber because orders were "dropped, canceled or lost by Ameritech at random." Brooks also complained that Ameritech continued to bill Brooks for unbundled services by "paper invoice," making it impossible to verify the accuracy of the bills in a timely manner. *See* Todd Stein January 17, 1997 letter to Dorothy Wideman, Exhibit 21 (TMC-12).

Q. WHAT CONCERNS DO YOU HAVE REGARDING AMERITECH'S ABILITIES TO HANDLE THE VOLUME OF INTERFACE TRANSACTIONS THAT AT&T WOULD GENERATE FOR PROCESSING IN AMERITECH'S OPERATIONS SUPPORT SYSTEMS?

A. AT&T has been given access to certain Ameritech estimates regarding order processing capacity in its Resale Service Center located in Milwaukee that reflect a limitation in processing capacity where manual processing of orders is involved. *See* Exhibit 22 (TMC-13), pp. 30-33. These estimates show that Ameritech's manual processing is quite labor intensive and will begin to impact service levels as soon as commercial volumes of order processing activities are generated. The consequences for services that Ameritech provides as the incumbent relative to the competitor LECs in other areas (including pre-ordering and repair and maintenance) have not been disclosed to the same extent.

Ameritech has advised the Wisconsin Commission that it can quickly add capacity in terms of people and systems to resolve the unplanned needs. However, its commitments cause me professional concern for the CLECs that have no practical alternative to relying on Ameritech for services. The amounts of training time needed to equip Ameritech staff to interact with its OSS and interfaces in order to support CLEC transactions can be lengthy. In the material filed by Ameritech with the Department of Justice in December, 1996, Exhibit 23(TMC-14), Ameritech states that the amount of time needed to train new employees in tasks related to unbundled loop provisioning -- just one of the types manual processing tasks involved in supporting CLECs -- is extensive, just to achieve a minimum level of proficiency.

Employee Classification	Training Interval
Loop Assignment	12 weeks
Frame Worker	4 weeks
Outside Technician	12 weeks
RCMAC	12 weeks
NECC Technician	12 weeks

These estimates are contrary to Ameritech's unverified claims about its ability to ramp up quickly to provide additional capacity.

PARITY OF PERFORMANCE

Q. WILL AMERITECH'S PARITY OF PERFORMANCE PROPOSAL PROVIDE DATA SUFFICIENT TO SHOW THAT "OSS ACCESS IS EQUIVALENT" FOR CLECS?

A. No. Even if Ameritech Illinois announces that it has successfully deployed its electronic interfaces for access to its operations support systems, the operability of the interfaces, and particularly their ability to operate in a nondiscriminatory manner, has not been demonstrated. Moreover, Ameritech Wisconsin has not proposed a measurement plan adequate to demonstrate the delivery of nondiscriminatory access to its operations support systems, and there is certainly no evidence that the OSS access promised by Ameritech will in fact be nondiscriminatory in the marketplace.

Q. WHAT IS REQUIRED IN ORDER TO DEMONSTRATE THAT NONDISCRIMINATORY ACCESS IS AVAILABLE AND BEING DELIVERED TO POTENTIAL COMPETITIVE LOCAL EXCHANGE COMPANIES?

A. Ameritech must show, through measured performance experience of a meaningful set of CLECs, that nondiscriminatory access is being delivered for all operations support systems related to pre-ordering, ordering, provisioning, maintenance and repair, and all aspects of billing. The FCC specifically encouraged state commissions to adopt reporting requirements related to assurance of nondiscriminatory access. (¶ 311).

Without a doubt, appropriately defined and sufficiently robust sets of measurements are crucial to demonstrating that nondiscriminatory access to each OSS functionality is actually being delivered, and that nondiscriminatory access continues to be delivered on an on-going basis. Lack of a mechanism to monitor and, if necessary, ensure prompt re-establishment of nondiscriminatory access to OSS functionality will have a chilling effect on the emergence of meaningful competition in the provision of telephone exchange services. Nondiscriminatory access to OSS functionality, and to unbundled network elements ("UNEs") in general, cannot merely be promised; it must be shown to exist across-the-board and it must be monitored going forward to assure that it continues to be provided.

Q. HOW CAN THE DELIVERY OF NONDISCRIMINATORY ACCESS TO OSS FUNCTIONALITY BE VERIFIED AND MONITORED?.

A. The reports offered by Mr. Mickens would not reveal all relevant access equity/parity information. Indeed, the absence of important details from the proposed reports may send false signals. For instance, Mr. Mickens' concept of measuring system/platform availability by using the OSS interfaces is misleading.

Ameritech's internal systems -- not the interfaces -- perform the actual processing of CLEC transactions which affect competition. The interfaces are only the means to share and report on the processing of transactions. The system availability must reflect the end-to-end processing on the Ameritech "side of the interface" -- including the OSS availability.

The graduated scale of the proposed Platform Availability chart is also misleading. System availability is relevant at much finer points of measurement. The operations support systems at issue here are operating 24 hours per day and seven days per week to handle Ameritech Ohio retail operations. In most industries that provide on-line services and system resources to others, systems availability that falls below 99.5% is unacceptable performance. The metrics offered by Mr. Mickens would therefore not sufficiently demonstrate critical performance needs.

Mr. Mickens believes that demonstrating transaction accuracy is relevant if the total on-line transaction time has a relationship with the total on-line transaction error time. The real issue is the frequency with which errors are detected -- not the amount of time spent in processing the errors. For each interface that receives transactions from CLECs and forwards those transactions to the ILEC systems, accuracy should be demonstrated by dividing the volume of transactions that are received by the number of transactions that are rejected.

The Business Function Completion Window is also inappropriate. It would be misleading to develop a relationship between transaction completion intervals and the amount of transaction time available in a month. Instead, the relevant test for parity is whether the interval for the CLEC is equal to the interval for Ameritech.

Finally, Mr. Mickens indicates that the first reports of the monthly measurements would be published after the first quarter is closed. This is grossly inadequate. The information must be made available on a more timely basis. I would recommend that it be required to be distributed by the second week of the month following actual results.

Generally, an acceptable measurement plan must embody at least four characteristics: (1) the plan must support statistically valid comparisons of CLEC experience to the experience of Ameritech's local service operations; (2) the plan must account for potential performance variations due to differences in service and activity mix; (3) the plan must monitor performance not only at the service level, but at the interface level as well; and (4) the plan must be implemented and be producing results which demonstrate that nondiscriminatory access to OSS functionality is, in fact, being delivered across all interfaces and a broad range of resold services and unbundled network elements. Although Ameritech has made some constructive proposals for a conceptual measurement plan, more work is necessary.

For instance, in assessing time to repair POTS, Ameritech proposes to report only on its success rate in restoring service within a 24 hour time period, tracking "% exceeding" that stated target. This approach would not reveal disparities in average performance within the targeted range. For instance, assuming that the average "time to restore" for Ameritech customers was 5 hours as compared to an average "time to restore" of 20 hours for AT&T customers and, in both cases, restoration time exceeded Ameritech's target interval in only 3% of the cases,

Ameritech's proposed parity performance report would inaccurately report this level of performance as "nondiscriminatory."

As noted above, Ameritech's plan also fails to sufficiently account for service mix differences. For example, installation intervals for complex business orders are likely to be substantially longer than installation intervals for single-line residence basic local service. Yet Ameritech proposes that it report average performance across all services, potentially masking poor performance in any individual area. For example, an average installation interval of 10 days may be acceptable if 90% of the orders were complex business orders but wholly unacceptable if 90% of the orders were for basic single-line residential service. Indeed, internal Ameritech performance reports separate performance data between residence and business.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

WISCONSIN PSC DOCKET NO. 6720-TI-120
REBUTTAL TESTIMONY OF TIMOTHY M. CONNOLLY

Q: DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A: Yes. On March 19, 1997, I filed direct testimony which addressed Ameritech's Operations Support System ("OSS") and interfaces.

Q: WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A: My rebuttal testimony addresses the testimony of Ameritech Wisconsin ("Ameritech") witnesses Joseph A. Rogers and Warren A. Mickens, and in particular responds to their claims that Ameritech has OSS interfaces in place that are fully operational and that currently provide services that are nondiscriminatory and equivalent to those which Ameritech itself receives. In particular, I will show that the testimony of Mr. Mickens and Mr. Rogers on several issues is inconsistent with information that Ameritech recently produced in response to Staff's data requests in this proceeding. In addition, Mr. Mickens makes some suggestions regarding the means to measure the quality of access to Ameritech's OSS interfaces, and I will discuss why his suggestions are deficient for this Commission's use.

Q: DO YOU AGREE WITH AMERITECH THAT THERE IS OPERATIONAL CERTAINTY REGARDING AMERITECH'S OSS INTERFACES FOR UNBUNDLED NETWORK ELEMENTS?

A: No. Contrary to Mr. Rogers' claim that Ameritech's OSS interfaces for unbundled network elements have been "up and running with 'live' customer transactions (either CLEC or IXC) for many months without system problems" (p. 11), the interfaces for unbundled network elements are only in a preliminary stage of development. Moreover, as the various "problem logs" produced by Ameritech in response to Staff's data requests in this docket reflect, there are numerous problems with the systems as they are currently operating.

Q: CAN THE ELECTRONIC INTERFACES USED FOR ORDERING UNBUNDLED LOOPS BE USED TO ORDER ALL OTHER UNBUNDLED NETWORK ELEMENTS?

A: No. First, it is somewhat misleading to refer to the electronic interface for unbundled loops. At present, 100 percent of the orders submitted by CLECs for unbundled loops are subject to manual intervention. Moreover, Ameritech's testimony about the ordering of loops provides no insight into the status of its interfaces for other unbundled elements. Further, even if Ameritech could show that interfaces are in place for individual unbundled elements (which is not the case), it has not attempted to demonstrate how these interfaces would operate if AT&T were to place an order for a *combination* of unbundled elements.

Q: IS AMERITECH'S REPAIR AND MAINTENANCE INTERFACE FOR UNBUNDLED NETWORK ELEMENTS OPERATIONAL?

A: No. Although Ameritech asserts that the interface for repair and maintenance is "fully tested" (Rogers, p. 10), it is clear that Ameritech is referring only to internal testing. This interface has not been subjected to full integration testing, and to AT&T's knowledge, it is not currently being used by any CLEC. The significant uncertainties relating to the performance of this interface, as well as current low volumes of customer orders resulting from other interface problems and actions by Ameritech, have led AT&T (and apparently every other CLEC) to request manual processing at this time.

Q: WHY ISN'T THE INTERNAL TESTING CONDUCTED BY AMERITECH SUFFICIENT TO ENSURE THAT THE INTERFACES ARE FULLY OPERATIONAL?

A: As I explained in my direct testimony, it is absolutely imperative when systems are developed for the purpose of working with other systems -- which is the case for AT&T's systems and Ameritech's systems -- that the two complementary systems be tested by the parties in a joint manner to ensure that they will communicate properly with each other. This end-to-end or full "integration testing" is the only effective way to test the adequacy of a systems interface. Internal testing simply cannot achieve this important goal. *See* ICC Staff Jennings

Supp. Reb., ICC Staff Ex. 4.02., p. 2 ("Just because Ameritech has completed internal testing of its various OSS, there is no assurance that other carriers will be able to effectively utilize the OSS in a commercially feasible manner.") (TMC-2).

Q: ARE THERE ANY OTHER ISSUES THAT YOU WOULD LIKE TO ADDRESS WITH RESPECT TO AMERITECH'S TESTIMONY REGARDING THE INTERFACES FOR UNBUNDLED NETWORK ELEMENTS?

A: Yes. Neither Mr. Rogers or Mr. Mickens has addressed Ameritech's continuing failure to provide electronic interfaces to AT&T that would enable AT&T to offer local service to its customers through its preferred entry mode, the unbundled platform. In January 1997, AT&T placed orders with Ameritech for service to customers in Illinois and Michigan via the unbundled platform, and in February, AT&T submitted additional platform orders for service to customers in Ohio. As of this date, Ameritech has not processed these orders, nor has it provided the interfaces necessary for AT&T to offer services using the unbundled platform.

Q: IS AMERITECH'S ORDERING INTERFACE FOR RESALE SERVICES FULLY OPERATIONAL?

A: No. As detailed in my direct testimony, roughly half of the resale orders placed by AT&T during the Illinois Service Readiness Testing (SRT) were rejected by

Ameritech's systems. (TMC-5). These results alone demonstrate that the Ameritech's systems are far from being operationally ready. No carrier could possibly begin commercial service to customers with such a high rejection rate.

Q: DO YOU AGREE WITH MR. ROGERS THAT THE ERRORS ENCOUNTERED DURING TESTING WERE "MINOR" AND THAT NONE WERE "CUSTOMER AFFECTING"?

A: No. In response to data requests served by Staff in this proceeding, Ameritech produced for the first time important information regarding the results of testing that Ameritech has performed on its OSS interfaces. For example, Ameritech has now produced and I have been able to examine such records as the "Order Testing Problem Log" dated 2/26/97, the "AIIS Testing Problem Log" dated 2/14/97, and the "All Resale Bugs Not Fixed" report dated 2/17/97. Based upon my review of these and other documents, I conclude that there are many instances of serious processing problems that contradict the claims that Mr. Mickens and Mr. Rogers have made to this Commission.

For example, the Order Testing Problem Log produced by Ameritech revealed that, during the period from January 1 through February 26, 1997, Ameritech reported a total of 212 incidents which Ameritech termed "Troubles." Of these "Troubles," 10 were classified by Ameritech as "Priority 1," which it defined as

"Very high: customer impacting; must address immediately" (emphasis added). Another 133 "Troubles" were classified by Ameritech as "Priority 2" or "High: orders are processed. However, problem does impact specific orders." See Ameritech Order Testing Problem Log, 2/26/97; 10:05:08 a.m.

Q: DO YOU AGREE THAT THE TEST ORDERS SENT BY AT&T TO AMERITECH WERE REJECTED DUE TO AT&T ERROR?

A: No. According to documents produced by Ameritech in this proceeding, as well as in other State commission proceedings, the vast majority of errors uncovered during testing have been caused by deficiencies in Ameritech's systems or its failure to provide sufficient information to AT&T. In addition, the Order Testing Problem Log that Ameritech recently produced in this proceeding contradicts Mr. Rogers' assertion that the problems are the fault of AT&T, not Ameritech.

Q: DO YOU AGREE THAT AT&T ORDERS AND AMERITECH ORDERS ARE REJECTED BY AMERITECH'S INTERNAL SYSTEMS AT SIMILAR RATES AND FOR SIMILAR REASONS?

A: No. Mr. Rogers offers no quantitative support for his claim that AT&T orders are rejected at rates and under circumstances similar to those experienced by Ameritech internally. As set forth in my direct testimony, nearly half of the orders submitted by AT&T during the Illinois Service Readiness Testing (SRT) were

rejected by Ameritech. I strongly doubt that Ameritech experiences rejection levels of its own orders at anywhere near this level.

Q: HAS THE TESTING REVEALED OTHER PROBLEMS WITH AMERITECH'S INTERFACES?

A. Yes. Although AT&T submitted resale service orders in Illinois to Ameritech using the electronic interface, an unacceptably high percentage of those orders were processed manually by Ameritech. During the four months of testing in Illinois, 54 percent of AT&T's total orders were subjected to manual processing by Ameritech, and 70 percent of the completed orders required manual intervention. (TMC-5).

Q: WHY DO SO MANY ELECTRONIC TRANSACTIONS REQUIRE MANUAL PROCESSING BY AMERITECH?

A: AT&T does not know, because Ameritech has refused to provide AT&T with this information. Contrary to Ameritech's claims, the high incidence of manual processing is not due to the content or complexity of the orders that AT&T submitted to Ameritech, for those orders were not unusual or complex. Many of them were simple migration orders. Moreover, a review of the "Order Status Report" produced in this docket provides some insights. According to that report, many orders are falling to manual because of "1P errors," Mortel failures or other